

1 THE HONORABLE ROBERT J. BRYAN
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9 **UNITED STATES DISTRICT COURT**
10 **WESTERN DISTRICT OF WASHINGTON**

11 STATE OF WASHINGTON,

12 Plaintiff,

13 v.
14 THE GEO GROUP, INC.,
15 Defendant.

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17 Pursuant to 28 U.S.C. § 1746(2), I, La Rond Baker, hereby declare as follows

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19 1. I am over the age of eighteen (18) and competent to testify and make this
declaration based on my personal knowledge.

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21 2. I am counsel for the State of Washington, and I make this declaration as a
representative of the State of Washington in support of the Motion for Remand.

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23 3. Attached hereto as **Exhibit A** a redacted copy of the ICE-GEO Contract,
HSCEDM-15-D-00015.

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4. Attached hereto as **Exhibit B** is a true and correct copy of an online printout of ICE's Performance Based National Detention Standards 5.8.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 8th day of November, 2017.

ROBERT W. FERGUSON
Attorney General

/s La Rond Baker
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